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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS SUPPLEMENTAL
BRIEF ON ANTHONY
LEVANDOWSKI'S ASSERTION OF
INDIVIDUAL ATTORNEY-CLIENT
PRIVILEGE AND THE SCOPE OF
UBER'S WAIVER**

23 vs.

24 UBER TECHNOLOGIES, INC.;
25 OTTOMOTTO LLC; OTTO TRUCKING
26 LLC,

27 Defendants.

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1 Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests
 2 to file under seal information in its Supplemental Brief on Anthony Levandowski’s Assertion of an
 3 Individual Attorney-Client Privilege and the Scope of Uber’s Waiver (Waymo’s Brief), filed
 4 concurrently herewith. Specifically, Waymo requests an order granting leave to file under seal the
 5 portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Brief	Highlighted in Blue	Defendants
Exhibit 1 to Waymo’s Brief	Entire Document	Defendants

9 **I. LEGAL STANDARD**

10 Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or
 11 portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under
 12 the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored
 13 to seek sealing only of sealable material.” *Id.*

14 **II. DEFENDANTS’ CONFIDENTIAL INFORMATION**

15 Waymo seeks to seal these documents only because Defendants have designated the
 16 information confidential and/or highly confidential. Declaration of James Judah (“Judah Decl.”) ¶ 3.
 17 Waymo takes no position on the merits of sealing the designated material, and expects Defendants to
 18 file one or more declarations in accordance with the Local Rules.

19 **III. CONCLUSION**

20 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the
 21 above listed documents accompany this Administrative Motion. For the foregoing reasons,
 22 Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

23 DATED: August 25, 2017

24 QUINN EMANUEL URQUHART & SULLIVAN,
 25 LLP

26 By /s/ Charles K. Verhoeven

27 Charles K. Verhoeven
 28 Attorneys for WAYMO LLC